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August 25, 2010

REC'D

**CERTIFIED MAIL**

Return Receipt Requested

AUG 28 2010

APCO

Ms. Rebecca Webber, Director  
Air and Waste Management Division  
U.S. Environmental Protection Agency  
901 N. 5th Street  
Kansas City, KS 66101

Mr. James Kavanaugh, Director  
Air Pollution Control Program  
Missouri Department of Natural Resources  
PO Box 176  
Jefferson City, MO 65102

RE: NESHAP RICE Initial Notification  
ROLLA MUNICIPAL UTILITIES  
Installation ID #161-0054  
NAICS Code: 221112

Dear Ms. Webber and Mr. Kavanaugh:

On March 3, 2010, the United States Environmental Protection Agency adopted final amendments to the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63 Subpart ZZZZ. These amendments were effective on May 3, 2010. Pursuant to Section §63.6645(a) and Section 63.9(b), ROLLA MUNICIPAL UTILITIES submits the following information as its Initial Notification:

1. Name and address of the owner/operator:

ROLLA MUNICIPAL UTILITIES  
102 West 9<sup>th</sup> Street  
Rolla MO 65401  
[info@rollamunicipalutilities.org](mailto:info@rollamunicipalutilities.org)  
573-364-1572

2. Address of the Existing Stationary Non-Emergency Limited Use RICE >500HP affected sources  
(subject to Subpart ZZZZ):

Address	Emission Unit
204 East 8 <sup>th</sup> Street	EU0010 thru EU0040
500 Sheron Avenue	EU0050 & EU0060
500 Lanning Lane	EU0070 & EU0080
10822 Dewing Lane	EU0090 & EU0100
2017 Industrial Park Drive	EU0110 & EU0120
3906 Hy-Point Blvd.	EU0130 & EU0140
1112 West 11 <sup>th</sup> Street	EU0150 thru EU0170

3. The relevant standard for the affected sources is found in Part II, Environmental Protection Agency, 40 CFR part 63, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines: Final Rule Federal Register/Vol. 75, No.41/Wednesday March 3, 2010, pg 9675, §63.6603(a). The date for compliance with this standard is May 3, 2013 as found in Part II, Environmental Protection Agency, 40 CFR part 63, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines: Final Rule Federal Register/Vol. 75, No.41/Wednesday March 3, 2010, pg. 9675, §63.6595(a)(1).

4. Description of the affected source: 17 each identical, Existing Stationary Non-Emergency, Limited Use RICE, 2876 HP, CATERPILLAR 3516. (see attached photo of Engine Information from affected source)

5. The types of HAPs emitted by affected sources are 1, 3-butadiene, acetaldehyde, acrolein, benzene, ethylbenzene, formaldehyde, n-hexane, naphthalene, PAH, polycyclic organic matter, styrene, toluene and xylene as listed in Part II, Environmental Protection Agency, 40 CFR part 63, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines: Final Rule Federal Register/Vol. 75, No.41/Wednesday March 3, 2010, III.B. on page 9651. No performance testing of HAP's has been performed on affected sources to determine actual HAP emissions.
6. ROLLA MUNICIPAL UTILITIES Potential Emissions of the installation (all 17- Existing Stationary Non-Emergency, RICE) of 2.27 (tons per year) assuming continuous operation of (8760 hours per year) of HAPs were obtained from the Environmental Protection Agency (EPA) document AP-42, Compilation of Air Pollutant Emission Factors, Fifth Edition, Section 3.4 Large Stationary Diesel and All Stationary Dual-Fuel Engines (1/95).

ROLLA MUNICIPAL UTILITIES (Part 70 Permit to Operate # OP2010-031 pg. 7.) Emission Limitation of < 250 tons of NOx per 12 consecutive months indirectly sets the HAPs Potential Emissions of the installation at .20 tons per 12 consecutive months resulting in ROLLA MUNICIPAL UTILITIES being categorized as a Area Source site as described in Part II, Environmental Protection Agency, 40 CFR part 63, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines: Final Rule Federal Register/Vol. 75, No.41/Wednesday March 3, 2010, III.A. on page 9650.

ROLLA MUNICIPAL UTILITIES plans to operate one (1) Existing Stationary Emergency RICE, 250 HP John Deere at the facility (811 Highway O) that is exclusively used for emergencies and meet the definitions outlined in 40 C.F.R. Part 63 Subpart ZZZZ. This RICE is not subject to emission controls but is subject to Management Practice Standards as described in Part II, Environmental Protection Agency, 40 CFR part 63, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines: Final Rule Federal Register/Vol. 75, No.41/Wednesday March 3, 2010, pg. 9656 [(IV) Summary of Significant Changes Since Proposal(B) Final Emission Standards, (5) All existing stationary emergency CI engines located at area sources must meet management practice standards.]

The following are considered not subject to Part II, Environmental Protection Agency, 40 C.F.R. Part 63 Subpart ZZZZ, NESHAP by meeting the EPA definition of Non-Road engines as described in 40 CFR §1068.30 (1), (i), (ii) and (iii): Two (2) Existing Non-Road Emergency RICE, 550 HP Detroit Diesels, one (1) Existing Non-Road Emergency RICE, 100 kW, General Motors Model 6043C.

If you have any questions, please do not hesitate to contact me.

Sincerely,

ROLLA MUNICIPAL UTILITIES



Rodney P. Bourne, P.E.  
General Manager

RB:slw  
enclosure

- c. MoDNR Southeast Area Regional Office (Poplar Bluff, MO)  
Floyd Gilzow, MPUA Director of Member Relations and Public Affairs  
Tom Parker, Operations Manager  
Derek Carroll, Operations Foreman  
David Gorrell, Power Production Foreman